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Hearing Date:
August 25, 2021 at 10:30 a.m.

UNITED STATE BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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	:	
In re	:	Chapter 11
	:	
893 4TH AVE LOFTS LLC,	:	Case No. 21-41367 (JMM)
	:	
Debtor.	:	
	:	
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**RESPONSE OF 5AIF SYCAMORE 2, LLC WITHDRAWING ITS PENDING MOTION
FOR DETERMINATION OF INAPPLICABILITY OF THE AUTOMATIC STAY**

TO: THE HONORABLE JIL MAZER-MARINO,
UNITED STATES BANKRUPTCY JUDGE:

5AIF Sycamore 2, LLC (the “Secured Lender”) as and for its response withdrawing its motion for a determination of the inapplicability of the automatic stay (the “Motion”), respectfully represents:

1. On June 8, 2021, the Secured Lender filed its pending Motion, seeking a determination of the inapplicability of the automatic stay to the Secured Lender’s UCC sale (the “Sale”) of the 100% ownership interest of Michal Uhr (“Uhr”) in 893 4th Ave Lofts LLC (the “Debtor”). [Dkt. No. 13].

2. A hearing on the Motion was held before the Court on July 7, 2021. At the hearing the Court continued the Motion to August 25, 2021, which would be after the scheduled date of the Sale.

3. The Sale occurred on August 11, 2021, and the membership interests of the Debtor were sold on that date. The current owner of the 100% membership interests in the Debtor is Secured Loan Holdings, LLC.

4. As a result of the Sale, the Motion is now moot, and the Secured Lender hereby withdraws the Motion.

WHEREFORE, the Secured Lender respectfully requests that the Court mark the Motion off its calendar as withdrawn, and grant such other and further relief as is just and proper.

Dated: August 23, 2021
New York, New York

Respectfully submitted,

HOLLAND & KNIGHT LLP
Counsel for the Secured Lender

By: /s/ Bruce J. Zabarauskas
Bruce J. Zabarauskas
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CERTIFICATE OF SERVICE

Bruce J. Zabarauskas, hereby declares:

1. I am an attorney admitted to practice law in the States of New York, Texas and California and am a member of the bar of this Court.

2. On August 23, 2021, I served a true and correct copy of the *Response Of 5AIF Sycamore 2, LLC Withdrawing Its Pending Motion For Determination Of Inapplicability Of The Automatic Stay* by first class mail upon: (i) Vincent M. Lentini, Esq., Proposed Counsel for the Debtor, Law Offices of Vincent M. Lentini, 1129 Northern Blvd., Suite 404, Manhasset, New York 11030; (ii) Michael Uhr, 9 Englewood Terrance, Lakewood, New Jersey 08701; (iii) Michael Uhr, 17 Dolson Road, Monsey, New York 10952; (iv) Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014; (v) Home Core Inc., 207 Lawrence Ave., Inwood, NY 11096; (vi) Best Super Cleaning LLC, 6014 16th Ave., Brooklyn, NY 11204; and (vii) Silvercup Scaffolding LLC, 29 Lorimer Street, Brooklyn, NY 11206.

Dated: August 23, 2021

/s/ Bruce J. Zabarauskas
Bruce J. Zabarauskas